

CLARIFICATION NUMBER CAO-00-020, REV. 0
RADIOGRAPHY TEST DRUM REQUIREMENTS
(SECTION B1-3b(2))

ISSUE

1. Can test drums used for determining radioassy total uncertainty be used to fulfill the radiography test drum requirements?
2. What is the frequency for scanning the test drum?
3. Is there any guidance regarding the sizes of the internal containers used in the training drums?
4. Can a single drum be used to satisfy this requirement?

CONCLUSION

1. Yes, as long as the test drums meet the minimum requirements in the permit.
2. There is a distinction made between qualification/re-qualification and the independent replicate daily/test batch scans.
 - a. Radiography operators must scan a training drum biannually to assure interpretations remain consistent and accurate
 - b. Test drums, representative of the waste matrix codes for which WSPF is being sought, must be examined and successfully identified prior to shipment.
3. The sizes for the internal containers are as follows:
Empty ONE GALLON paint can
ONE GALLON bottle with three tablespoons of fluid
ONE GALLON bottle with one cup of fluid (upside down)
4. Yes. If a generator site can construct a single drum with sufficient stratification and sufficient variety to meet the permit requirements, it would be acceptable.

DISCUSSION

3. Section B1-3b(2), states:

A radiography test drum shall include items common to the waste streams to be generated/stored at the generator/storage site. The test drums shall be divided into layers with varying packing densities or different drums may be used to represent different situations that may occur during radiography examination at the site. A test drum or

test drums representative of the waste matrix codes for which Waste Stream Profile Form approval is sought, must be examined and successfully identified prior to waste stream shipment. The following is a list of required elements of a radiography test drum(s):

- Aerosol can with puncture
- Horsetail bag
- Pair of coveralls
- Empty bottle
- Irregular shaped pieces of wood
- Empty one gallon paint can
- Full container
- Aerosol can with fluid
- One gallon bottle with three tablespoons of fluid
- One gallon bottle with one cup of fluid (upside down)
- Leaded glove or leaded apron
- Wrench

These Items shall be successfully identified by the operator as part of the qualification process.